

**COMPREHENSIVE LONG-TERM ENVIRONMENTAL ACTION NAVY (CLEAN II)**  
**Northern and Central California, Nevada, and Utah**  
**Contract Number N62474-94-D-7609**  
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**Prepared For**

**DEPARTMENT OF THE NAVY**  
**Amelia Duque, Engineer-in-Charge**  
**Engineering Field Activity West**  
**Naval Facilities Engineering Command**  
**San Bruno, California**

**FINDING OF SUITABILITY TO LEASE FOR**  
**PARCELS T081, T082, T083, NORTHWEST**  
**CORNER OF T108, T109, T110, T111**  
**TO SUPPORT THE LEASE OF**  
**THE POLICE TRAINING ACADEMY AT**  
**NAVAL STATION TREASURE ISLAND, CALIFORNIA**

**REVISED FINAL**

**April 14, 1997**

**Prepared By**

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**FINDING OF SUITABILITY TO LEASE FOR PARCELS  
T081, T082, T083, THE NORTHWEST CORNER OF T108, T109, T110, T111  
AT NAVAL STATION TREASURE ISLAND**

**1.0 PURPOSE**

- a. The purpose of this Finding of Suitability to Lease (FOSL) is to document environmentally related findings regarding the proposed lease of Parcels T081, T082, T083, the northwest corner of T108, T109, T110, and T111 (the site) at Naval Station Treasure Island (NSTI) in San Francisco County, California. The subject property is described in Section 2.0 below and is shown in Figures 1 and 2 at the end of this document. The subject property will be leased to the City of San Francisco. The Navy owns the land and buildings at the subject property.
- b. This FOSL is a result of a thorough analysis of the information contained in the following documents:
- *Final Limited Environmental Baseline Survey/Community Environmental Response Facilitation Act Report for Naval Station Treasure Island*, ERM-West, Inc., December 1, 1994 (Environmental Basewide Survey Community Environmental Response Facilitation Act Report)
  - *Final Basewide Environmental Baseline Survey Report for Naval Station Treasure Island*, ERM-West, Inc., May 19, 1995 (basewide EBS)
  - *Final Asbestos Survey Report Naval Station Treasure Island*, Mare Island Naval Shipyard, December, 1995)
  - *Final Site-Specific Environmental Baseline Survey for Parcels T081, T082, T083, T109, T110, and T111 at Naval Station Treasure Island*, PRC Environmental Management, Inc. (PRC) and GAIA Consulting, Inc. (GAIA), December 18, 1996 (Site-specific Environmental Basewide Survey)
  - *Final Environmental Baseline Survey Sampling Workplan for Naval Station Treasure Island*, ERM-West, April 30, 1996
  - *Draft Remedial Investigation Report Naval Station Treasure Island*, PRC, 1996
  - *Phase IIB Remedial Investigation Summary of Validated Data*, Naval Station Treasure Island. PRC, 1996.
  - *Preliminary Results for Flux Chamber Sampling at IR Sites 6, 22, and 24*, PRC, 1996

## 2.0 PROPERTY DESCRIPTION

The site encompasses 11.9 acres and consists of Parcels T081, T082, T083, the northwest corner of T108, T109, T110, and T111. The site has been divided into two subareas known as EBS Area 1 (Parcels T081, T082, and T083), and EBS Area 2 (the northwest corner of Parcel T108 and Parcels T109, T110, and T111). EBS Area 1 is located in the east-central portion of NSTI and EBS Area 2 is located along the northeastern shoreline of the island. The two subareas are separated by approximately 2000 feet. The available information indicates that EBS Area 1 was used as a gymnasium and fitness center, and that EBS Area 2 was used for storage, administration and classrooms for training facilities, outdoor training areas, and parking.

EBS Area 1 is bounded by Parcels T070, T072, and T120 to the east, Parcel T061 to the southeast and south, Parcel T084 to the southwest, Parcel T085 to the west, and Parcel T080 to the northwest and north. No Installation Restoration sites are located immediately adjacent to EBS Area 1. The closest IR site to EBS Area 1 is IR Site 22 located at Parcel T076. This IR site is located over 300 feet east of EBS Area 1 and as such is not expected to impact EBS Area 1.

EBS Area 2 is bounded by San Francisco Bay and Parcel T115 to the east, Parcel T113 to the southeast, Parcels T112 and the remainder of Parcel T108 to the south, Parcel T103 to the west, and San Francisco Bay to the northwest and north. IR Sites 6, 7, and 12 are located on adjacent Parcels T108, T113 and T103, respectively. IR Site 10 is located on Parcel T114 approximately 60 feet south of Parcel T111. Figure 1 shows the lease areas and the location of adjacent and nearby IR sites.

The northwest corner of Parcel T108 consists of a 125-foot by 125-foot area, covering about 15,625 square feet. The northwest corner lies outside the fenced area identified as IR Site 6. It is currently used as a small parking lot and will continue to be used for parking under the lease. The northwest corner of Parcel T108 was added to the area to be leased after completion of the site-specific environmental baseline survey; however, the area was evaluated during the site reconnaissance and was included in the risk evaluation for EBS Area 2.

Currently, two buildings (Building 402 on Parcel T083 and Building 497 on Parcel T082) cover approximately 16 percent of EBS Area 1, and three buildings (Building 461 on Parcel T110, and Buildings 462 and 463 on Parcel T111) cover approximately 17 percent of EBS Area 2. Building 402 was built in 1961, and upgraded in 1984. Building 497 was built in 1976, and converted to its present use in 1986. Buildings 461, 462, and 463 were constructed in 1970. Building 497 is currently used as a fitness center, Building 497 is the gym, Buildings 461 houses the Fleet Training Command, and Buildings 462 and 463 are currently vacant (they most recently housed administrative and training activities).

The remaining 83 percent of the site is open space, consisting of paved parking areas, undeveloped/landscaped areas, former outdoor training facilities (including the foundation from the former USS Pandemonium mock-up), and an area for hazardous materials/hazardous waste storage. Several pad-mounted and pole-mounted transformers are present in the open space areas.

Aerial photographs indicated that EBS Area 1 was formerly occupied by eight rectangular-shaped buildings. The four buildings on the southeastern half of the area were demolished by 1958, and the remaining four buildings were demolished between 1971 and 1983.

Three buildings (Buildings 55, 276, and a portion of Building 270) formerly located at Parcel T109 have been demolished. Building 55 served as a rod and gun locker and a storage area for inert arms. Building 276 served as a rod and gun locker, film exchange, office, and classroom. Building 270 was used to store paint and oil. In addition, a pier formerly bordered Parcel T109 to the north; the use of this pier is unknown. A portion of Building 270 was formerly located on Parcel T110 (where Building 461 now stands). Building 270 was constructed before 1948 and demolished in 1969. The following 11 buildings were formerly located on Parcel T111:

- Building 42 - pyrotechnics and small arms storage
- Building 56 - shop and storage
- Building 57 - shop and storage
- Building 58 - incinerator and refuse, paint shop
- Building 59 - office, work improvement program
- Building 60 - shop and storage
- Building 327 - salvage
- Building 336 - linoleum shop
- Building 337 - mason's locker
- Building 403 - incinerator
- Building 404 - incinerator

No additional information is known regarding the historical activities at these buildings.

A suspect underground storage tank (UST 461) was identified at Parcel T109; it was reportedly to be used as part of a transformer coolant containment system. However, according to the basewide EBS, no evidence exists that suggest the UST was actually installed. The basewide EBS concluded that the tank does not exist; this conclusion

is supported by the fact that no evidence of a potential UST was noted at the suspect location during the SSEBS site reconnaissance.

### **3.0 REGULATORY COORDINATION**

The California Environmental Protection Agency (Cal-EPA), the Department of Toxic Substances Control (DTSC), the Regional Water Quality Control Board (RWQCB), and the U.S. Environmental Protection Agency (EPA) were notified at the initiation of the SSEBS and the FOSL and were provided workable draft documents to facilitate their consultative role in developing the environmental documents. Regulatory comments received during SSEBS and FOSL development were reviewed and addressed, incorporated, or appended as appropriate. Prior to conducting the SSEBS and FOSL for the subject property, a scoping meeting was conducted with the Navy and the regulatory agencies.

### **4.0 NATIONAL ENVIRONMENTAL POLICY ACT COMPLIANCE**

Based on the description of the proposed lease, an environmental analysis was conducted and a categorical exclusion document was prepared, in accordance with the requirements of NEPA and the Navy's Environmental and Natural Resources Program Manual (OPNAVINST 5090.1B). It was determined that implementation of the lease would qualify for categorical exclusion number 19. Categorical exclusion number 19 covers granting of leases, easements, and permits where there is no substantial change in land use, and that would not result in significant environmental impacts. It is the Navy's position that the use of the former training facility and fitness center/gymnasium as a police training academy and associated fitness training area does not constitute a substantial change in use.

### **5.0 ENVIRONMENTAL CONDITION OF THE PROPERTY**

In the basewide EBS for NSTI, which included a visual site inspection of each parcel, Parcels T081, T082, T083, the northwest corner of T108, T109, T110, T111 were classified as base realignment and closure (BRAC) Categories 7, 1, 1, 6, 6, 7, and 7, respectively. BRAC Category 7 identifies areas where investigation results show that the presence of sources or releases of hazardous substances is suspected, but not well characterized. BRAC Category 1 identifies areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas). BRAC category 6 identifies areas where storage, release, and/or disposal of hazardous substances has occurred, but required response actions have not yet been implemented.

The BRAC parcel classifications were recently updated, and the BRAC parcel classifications for the six parcels were reevaluated. Based on the October 23, 1996 BRAC Cleanup Team meeting, Parcel T081 is now classified as BRAC category 1, and Parcel T109 is now classified as BRAC category 7. The remaining parcels were not reclassified. Based on the current parcel classification status, Parcels T081, T082, and T083 are considered suitable for transfer without restrictions.

A list of environmental factors and resources considered in the EBS property assessment is provided in Table 1.

## **6.0 LEASE NOTIFICATIONS AND RESTRICTIONS**

The environmental documents listed in Section 1.b of this FOSL were evaluated to identify environmental factors that require specific restrictions under the lease to preclude threats to human health or the environment, or require notification to the lessee. The factors that were considered are listed in Table 1. The factors that require either restrictions or notification are also identified in Table 1 and are discussed below. The Navy has determined that the remaining factors listed in Table 1 require no restrictions in the lease.

### **6.1 HAZARDOUS SUBSTANCES NOTIFICATION**

Hazardous substances are known to have been stored or used in Building 463, and in the open space of Parcel T111. A hazardous waste accumulation (90-day storage) area used by the Fleet Training Command (FTC, formerly the Naval Technical Training Center [NTTC]) is present on Parcel T111. Currently, the Navy Public Works Center-San Francisco (PWC) uses a portion of the parcel to temporarily store fuel, vacuum, pickups and other types of trucks, and building materials. Three 5-gallon buckets of solid sodium hydroxide were also noted in the area being used by PWC. PWC is currently cleaning out sediment from storm drains; Parcel T111 is being used as a staging area for these activities. Water removed from the storm drains is collected in two 1000-gallon plastic storage tanks. At the time of the site reconnaissance, one tank was full and the other tank was empty.

The fenced hazardous materials storage area is a paved, bermed storage pad approximately 20 feet by 35 feet in area. It contains various materials in drums, containers, and cabinets. The area adjacent to the pad is also used for storage by FTC, primarily for empty containers, drums, and cardboard boxes. There are 95 empty fire extinguishers located in this area. In addition, 57 empty 55-gallon drums were stored on pallets and on the ground in this area. Several of the drums were open top drums and contained up to 10 inches of water. One empty acetylene bottle was also located in this area.

TABLE 1

## Environmental Factors/Resources Considered for the Police Training Academy Site

Environmental Factors Considered	Lease Restriction or Notification Required?
Hazardous Substances (Notification)	Yes
Installation Restoration Program (IRP) and Areas of Concern	Yes
Medical/Biohazardous Wastes	No
Oil/Water Separators	No
Unexploded Ordnance	No
Petroleum Products and Derivatives	Yes
Radioactive & Mixed Wastes	No
Storage Tanks	Yes
Asbestos	Yes
Drinking Water Quality	No
Indoor Air Quality	No
Lead-Based Paint (High-Priority Facilities)	No
Lead-Based Paint (Low-Priority Facilities)	Yes
Polychlorinated biphenyls	No
Radon	No
Air Conformity/Air Permits	No
Energy (Utilities such as Natural Gas, Electric, and Coal)	No
Flood Plains	No
Hazardous Waste Management (By Lessee)	Yes
Historic Property (Archeological/Native American, Paleontological)	No
Occupational Safety and Health Administration	No
Outdoor Air Quality	No
Prime/Unique Farmlands	No
Sanitary Sewer Systems (Wastewater)	No
Sensitive Habitat	No
Septic Tanks (Wastewater)	No
Solid Wastes	No
Threatened/Endangered Species	No
Transportation	No
Wetlands	No

At the time of the site reconnaissance, the fenced storage area contained seven large hazardous materials storage cabinets and 11 55-gallon drums on pallets. The drums contained waste paints, oils, greases, solvents, and non-spent, out-of-date emergency escape breathing devices, which are classified as oxidizers (i.e., they contain potassium perchlorate and/or sodium perchlorate). According to the Navy, all the materials were lab-packed, and consisted of both liquids and solids. Each of the hazardous materials lockers has built-in secondary containment. The seven cabinets were labeled as follows (contents are noted in parenthesis):

- Cabinet #1: Waste (various spill response materials, all unused)
- Cabinet #2: Cleaning Gear (30 1-gallon bottles of liquid tank iodine, approximately 20 gallons of soap and carpet cleaner, and 30 boxes of hand soap)
- Cabinet #3: Grease (1 2-liter cylinder of 25 ppm hydrogen sulfide in nitrogen test gas, several empty solvent and ammonia containers)
- Cabinet #4: Paint (2 1-gallon bottles of padding compound, 2 1-pint bottles of TCE, and 1 1-pint bottle of 1,1,1-TCA)
- Cabinet #5: Grease (4 full 5-gallon cans of JP-5, 3 full 5-gallon cans of gasoline, 1 5-gallon pail of ion exchange resin, and several empty gasoline and JP-5 cans)
- Cabinet #6: Corrosive (2 16-oz. bottles of roller descatching solution, 7 2-oz. bottles of waste reagent (sulfuric acid and sodium bisulfite))
- Cabinet #7: Oxidizers (1 kg sodium nitrite, 1 lb. sodium bicarbonate)

At the time of the EBS site inspection, various hazardous substances and hazardous materials were noted at Parcel T111. CS powder, used during tear gas training exercises within Building 463, is stored in a small cabinet located between Buildings 462 and 463. The seven hazardous materials storage lockers located in the FTC storage area, contained approximately 1,000 gallons total of adhesive, hydraulic fluid, paint, joint compound, floor cleaner, janitorial supplies, lubricating oil, grease, toner, primer, brake fluid, gasoline, resin, dry cleaning solvent, floor polish remover, toilet cleaner, battery water, and calcium hypochlorite during the site inspection. These chemicals were used for personnel training by the NTTC.

The bermed area also contained five 55-gallon drums of various wastes (hazardous waste, potassium hydroxide, oily rags). More than 100 gallons of waste petroleum products and nonhalogenated organic compounds generated by FTC have been stored here. Resource Conservation and Recovery Act wastes are removed by the RCRA contractor and disposed of by DRMO.

Small quantities (approximately 20 gallons total) of lithographic chemicals were observed in a storage locker outside of Building 461 during the 1994 EBS inspection. This storage locker was no longer present during the



most recent site reconnaissance. In addition, mercuric nitrate was generated at Building 461 as part of the training activities. According to the available documents, approximately 100 pounds of mercuric nitrate were generated each quarter, and disposed of through DRMO. The only hazardous material noted at Parcel T083 during the SSEBS site reconnaissance was a 1-gallon container of floor/mop cleaner. No chemical storage was observed on Parcels T081, T082, the northwest corner of T108, T109, or T111 during the 1996 reconnaissance. No sources of releases have been identified at the lease area.

In addition, pesticides were routinely used around buildings and at recreational areas. This information is referenced in the EBS/CERFA Report and the basewide EBS and is summarized in the SSEBS. Table 2 provides the notice of hazardous substances.

## **6.2 INSTALLATION RESTORATION PROGRAM AND AREAS OF CONCERN**

No IR sites are located in close proximity (or are likely to impact) EBS Area 1. IR Sites 6, 7, 10, and 12 are located hydraulically upgradient from EBS Area 2. Chemicals of concern have been detected at low concentrations in Parcel T109 soil and groundwater samples, and in Parcel T108 and T111 groundwater samples. Elevated levels of benzene and TPH-gasoline were detected in groundwater at IR Site 6, immediately south of Parcel T109. Five VOCs (benzene, ethylbenzene, o-xylene, tetrachloroethene, and toluene) were also detected in air samples at IR Site 6. The detected constituents were evaluated in the risk evaluation in the SSEBS, and are not expected to be of concern for the proposed reuse of the northwest corner of Parcel T108 and Parcels T109, T110, or T111.

**Notification/Restriction.** The lessee will be restricted from conducting excavation, drilling, or other ground disturbing activity, other than minor repairs of the pavement, at the northwest corner of T108 and Parcels T109, T110, and T111 without prior written Navy approval and Navy coordination with applicable federal and state regulatory agencies, as necessary. In addition, the lessee will be prohibited from installing any groundwater wells at the subject property, or otherwise using groundwater without prior consent and oversight from the Navy. Provisions will also be placed in the lease to allow the Navy and recognized regulatory agencies unrestricted access to the leased property to conduct necessary investigation and/or cleanup activities. The lessee may not damage existing or future Installation Restoration Program monitoring wells. The lessee will be responsible for any damage it causes to the wells.

Because remediation is planned at adjacent IR Site 6, and may be required at IR Site 12, the lessee is required to provide access to the Lease Area 2 for activities related to the IR program. Remediation activities associated with IR Site 6 will affect all of Parcel T108 and portions of parcels T109 and T111. Remediation activities at IR Site 12 may affect Parcel T109. Access restrictions may include requirements to vacate portions of the lease area

**TABLE 2**  
**NOTICE OF HAZARDOUS SUBSTANCES STORED AT**  
**PARCELS T081, T082, T083, T109, T110, AND T111**

Notice is hereby provided that the information set forth below from the basewide environmental baseline survey contains a notice of hazardous substances that are known to have been stored for 1 year or more on Parcels T081, T082, T083, T109, T110, and T111, and the dates such storage occurred.

Parcel	Facility Number	Facility Name	Hazardous Substance(s)	Quantity Stored	Dates Stored
T081	Open Space	N/A	No evidence of current or former hazardous waste generation and/or storage.	None	N/A
T082	497	Exercise facility	No evidence of current or former hazardous waste generation and/or storage.	None	N/A
T083	402	Gymnasium	Floor/mop cleaner	1 gallon	Observed in 1996
T109	Open Space	Parking area	Lithographic chemicals (including electrostatic solutions and solvents)	20 gallons	Observed in 1996
T110	Former Building 270	Paint and oil storage	Paint and oil	Unknown	Prior to 1970
T110	461	Classroom and administrative offices	Mercuric nitrate	100 pounds per quarter	Reported in 1992
T111	462, 463, and Open Space	Parking area, hazardous material storage, and training area	CS powder, adhesives, hydraulic fluid, paint, joint compound, floor cleaner, janitorial supplies, lubricating oil, grease, toner, primer, brake fluid, gasoline, resin, dry cleaning solvent, floor polish remover, toilet cleaner, battery water, and calcium hydrochlorite. Potassium hydroxide, oily rags, waste petroleum, nonhalogenated organic compounds.	1,000 gallons of adhesives, five 55-gallon drums of various wastes, 100 gallons of waste petroleum	Observed in 1994 and 1996

(specifically the parking lots and open space surrounding building 461) and requiring tenant personnel to enter the leased premises via a specific route. It is currently anticipated that the buildings within the lease area 2 (buildings 461, 462, and 463) will remain accessible to and occupied by the tenant during the remediation program.

### **6.3 ABOVEGROUND STORAGE TANKS**

There are no fixed Aboveground Storage Tanks on the site. At the time of the follow-up reconnaissance, two portable plastic 1,000 gallon ASTs were present on Parcel T111. One tank was filled with water removed from storm drains, and the other was empty. Both tanks were in good condition. PWC will remove both ASTs and all other items on the parcel prior to the lease.

**Notification/Restriction.** The lessee will manage and maintain any ASTs it brings onto the site in accordance with all applicable federal, state, and local regulations.

### **6.4 ASBESTOS-CONTAINING MATERIALS**

An asbestos inspection was conducted at NSTI by Mare Island Naval Shipyard in the winter of 1995. Asbestos-containing material (ACM) was identified in Buildings 402 and 461. Both buildings contained some damaged ACM that had low to moderate friability. In addition, suspect ACM was identified in Building 497. All of the suspect ACM was non-friable and undamaged. No sampling was conducted and no suspect ACM was identified at Buildings 462 and 463. The damaged, friable, and accessible ACM identified at Buildings 402 and 461 will be remediated by the Navy prior to the lease. ACM may also be present in insulation around the steam pipes at some of the parcels. Pipes are likely to be located in the walls and crawl spaces within the buildings, and in the ground leading to the buildings.

**Notification/Restriction.** The lease will require the lessee to routinely evaluate the condition of existing ACM and comply with all applicable federal, state, and local laws relating to asbestos. Prior to reconstruction or remodeling, the lessee must submit plans to the Navy to prevent the unknowing disturbance of potential ACM. For the purposes of the this lease, the lessee will agree that during its use and occupancy of the property, it will bear all costs for managing the ACM properly. The Navy will also require the lessee to obtain written Navy approval prior to any construction or modification to any building structure.

## 6.5 POLYCHLORINATED BYPHENYLS

The lessee will be advised, through the Environmental Condition Report (ECR) and the lease, that four pad-mounted, oil-filled transformers, and three pole-mounted, oil-filled transformers are located on the site. All of these transformers have been tested and contain less than 5 parts per million (ppm) polychlorinated biphenyls (PCBs). The basewide EBS indicates that the transformer on parcel T109 contained 740,000 ppm of PCBs. However, information gathered during the site reconnaissance indicates that the transformer was replaced within the last 12 months, and that the new transformer does not contain PCBs.

The lessee will be provided with a list indicating equipment location and the existence of PCB contamination associated with the equipment, if applicable. No evidence of release of PCB-containing oil was observed at the site.

Notification/Restriction. The Navy will be responsible for disposing of PCB-containing equipment. PWC inspected caged transformers and has sampled transformer oil to assess PCB content. The Navy will be responsible for any necessary remediation of the PCB contamination from PCB-containing equipment. For the purposes of this lease, the lessee will agree that, in its use and occupancy of the property, the lessee will comply with all applicable local, state, and federal laws relating to disposal of equipment that is regulated as hazardous waste or PCB-contaminated.

## 6.6 LEAD-BASED PAINT (LOW PRIORITY FACILITIES)

Due to the ages of the buildings present on site, lead-based paint may be present on interior and exterior surfaces. The paint on the buildings to be leased is in good condition.

Notification/Restriction. The lease will restrict construction, alteration, or modification (including paint stripping and sanding) without prior testing of the paint and notification and approval by the Navy prior to the initiation of the activity.

## 6.7 HAZARDOUS WASTE MANAGEMENT (BY LESSEE)

The lessee is anticipated to use small quantities of hazardous materials on the property as part of maintenance operations associated with the proposed police training academy.

**Notification/Restriction.** The lessee will be required through the lease to comply with all applicable laws and regulations pertaining to the use, treatment, storage, disposal, and transportation of hazardous materials. The lessee will also be required to maintain and make available to the Navy all records, inspection logs, and manifests that document compliance. The lessee will be required to have an approved plan for responding to hazardous waste, fuel, or other chemical spills prior to commencement of operations on the leased property. Furthermore, the lessee will be required to construct and operate any necessary hazardous waste storage facilities, and obtain all required permits, including its own EPA hazardous waste generator identification number (EPA ID number).

## **7.0 REGULATORY AGENCY COORDINATION**

DTSC, the RWQCB, and EPA were notified at the initiation of the SSEBS and the FOSL and were provided workable draft documents to facilitate their consultative role in development of the environmental documents. Regulatory agency comments were received on December 5, 1996, and were incorporated or addressed in the document. The regulatory agencies concurred that their comments were adequately addressed on December 20 and 27, 1996 (EPA and DTSC, respectively).

## **8.0 UNRESOLVED REGULATORY AGENCY COMMENTS**

All regulatory agency comments were addressed and/or incorporated into this document. No regulatory agency comments were unresolved.

## **9.0 RECOMMENDED LEASE RESTRICTIONS**

Restrictions contained herein are a result of the environmental findings identified in the SSEBS and were assessed in accordance with California Military Environmental Coordination Committee (CBCEC) document *Evaluation of Risks for the Purpose of Reaching a FOSL*, dated January 9, 1995. Parcels T081, T082, T083, the northwest corner of T108, T109, T110, and T111 may be used pursuant to the proposed lease, with the following specified use restrictions in the lease, with acceptable risk to human health and the environment.


- a. The lessee and/or authorized sublessee will not dispose of any hazardous materials or waste at the subject property.

- b. The lessee and/or authorized sublessee will be responsible for obtaining all necessary permits and licenses for their own operation. Any violation of permit conditions will be grounds to require the lessee and/or authorized sublessee to cease operations or to terminate the lease. The lessee and/or authorized sublessee will comply with California Environmental Quality Act (CEQA) requirements as may be applicable.
- c. The lessee will submit all proposed construction and modification plans to the Navy for prior approval to ensure protection of human health and the environment at the subject property.
- d. The lease will require the lessee to routinely evaluate the condition of existing ACM and comply with all applicable federal, state, and local laws relating to asbestos. Prior to reconstruction or remodeling, the lessee must submit plans to the Navy to prevent the unknowing disturbance of potential ACM. For the purposes of this lease, the lessee will agree that during its use and occupancy of the property, it will bear all costs for managing the ACM properly. The Navy will also require the lessee to (1) obtain written Navy approval prior to any construction or modification to any building structure, and (2) submit an ACM management plan within 30 days of leasing the property.
- e. The lease will restrict construction, alteration, or modification (including paint stripping and sanding) without prior testing of the paint and notification and approval by the Navy prior to the initiation of the activity.
- f. The lessee will be prohibited from digging any foundations, trenches, ditches, holes, or otherwise disturbing the soil, including soils below the groundwater table, at Parcels T108, T109, T110, and T111 unless proper dust control measures and appropriate health and safety protection measures are implemented and maintained during these activities, and prior consent and oversight from the Navy has been obtained. This lease restriction will not apply to routine landscaping activities.
- g. The lessee will be prohibited from installing any groundwater wells at the subject property, or otherwise using groundwater without prior consent and oversight from the Navy.
- h. Uses by the lessee and authorized sublessee are limited to a type and nature of use that is described in the lease document.

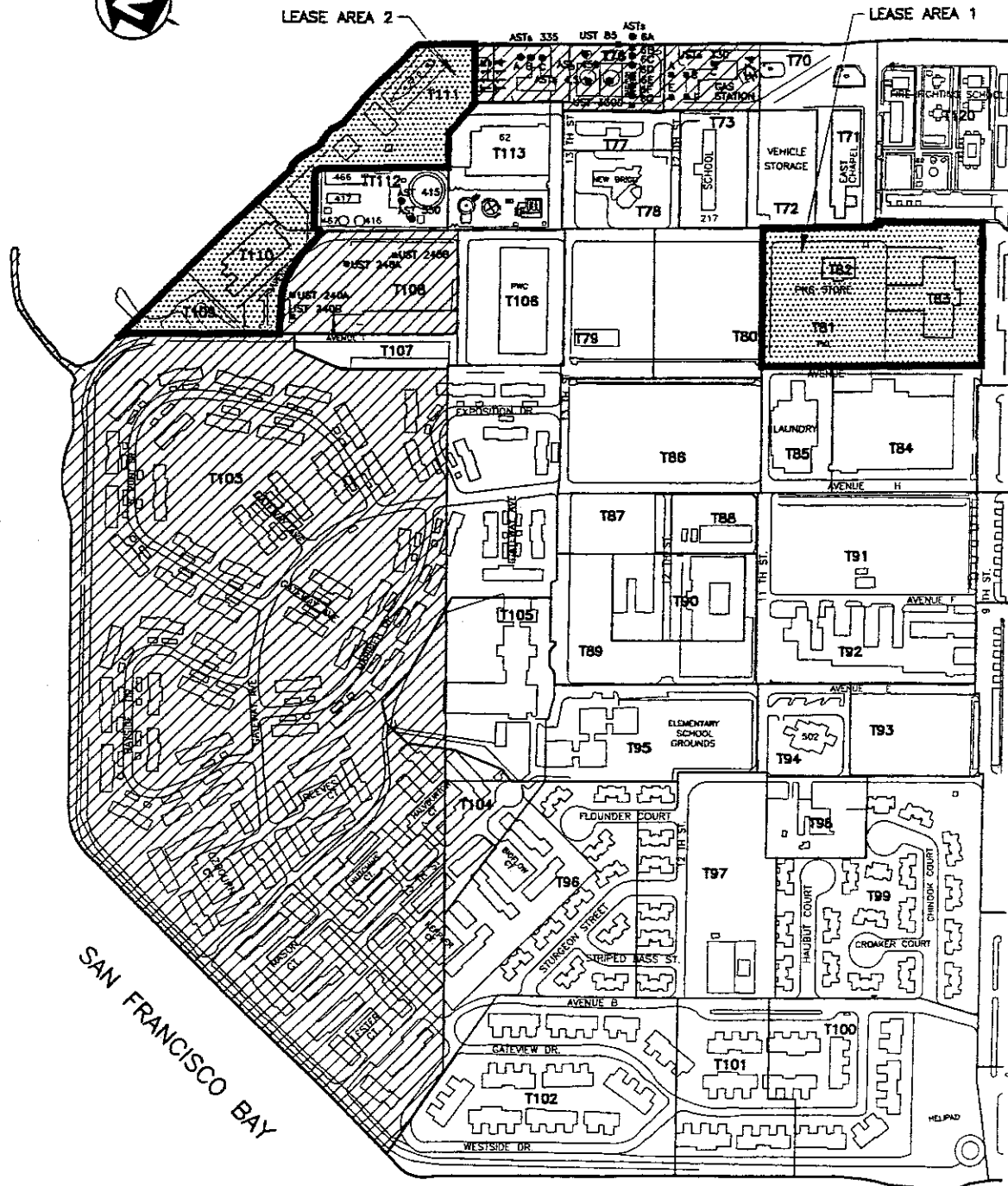
- i. The Navy and regulatory agencies reserve the right to enter the subject property to conduct investigations and surveys, collect samples, perform remediation, access monitoring wells, or engage in other activities associated with the IR and BRAC programs.

#### 10.0 FINDING OF SUITABILITY TO LEASE

Based on the foregoing information and analysis, I find that the subject property (as identified in Section 2.0) is suitable to lease and may be used pursuant to the proposed lease, with the specified use restrictions in the lease, with acceptable risk to human health or the environment and without interference with the environmental restoration process.

 28 APR 1997  
Date

R.G. HOCKER JR.  
CAPTAIN, CE, USN  
Commanding Officer  
Engineering Field Activity, West  
Naval Facilities Engineering Command



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PROPOSED LEASE AREA

### LOCATION OF UNDERGROUND STORAGE TANKS

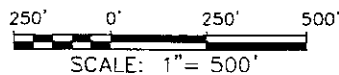


FIGURE 1  
SITE MAP  
SHOWING LEASE AREAS  
TREASURE ISLAND